

UNITED STATES DISTRICT COURT  
Northern District of New York  
6th Judicial Division

U.S. DISTRICT COURT – N.D. OF N.Y.

**FILED**

**Mar 06 - 2024**

John M. Domurad, Clerk

APRIL CHANDLER.

Plaintiff

-against-

MARK SKIPPER AKA SKIP ARCHIMEDES,  
MICHAEL MALOY, TOM HARRISION,  
DAVID GUC ET AL.

Defendants

Case No.3:24 CV-206

**ANSWER AND EXHIBITS**

Petitioner emailed Defendants asking for their attorney's information to cc. court documents. Defendants were not served via email. LA County Sheriffs have been sent court documents and they will send Petitioner proof of service after they have served Defendants, which Petitioner will submit to the Court on receipt.

In regards to Federal Copyright, Petitioner has filed with the Copyright office 1-13494149971, however, Defendant Michael Maloy submitted a fraudulent application to the Copyright office for Petitioners project Quest For Youth. The application clearly asks if the person applying is a "work for hire", which deems Defendant's application void. Defendant was brought onto project under "work for hire" as shown in the following Exhibits.

Signed:  \_\_\_\_\_

Petitioner

Date: 03/06/2024

# EXHIBIT 1

## Submission of Federal Copyright Quest For Youth Documentary Film by Petitioner April Chandler

← → ↺ 🌐 eservice.eco.loc.gov/siebel/app/eservice/enu?SWECmd=Start ☆ 📱 🌐 Relaunch to update ⋮

Copyright  
United States Copyright Office

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<< Back ||

Case Summary:

Case #: 1-13494149971

Type of Case: Motion Picture/AV Work

Opened: 2/8/2024

Title: Quest For Youth

Contact Name: April Chandler

Fee Due: 65.00

Service Fee Paid: 65.00

Claim Status: Pending

Submit Your Work(s)

To complete your submission, please submit the [required copy\(ies\)](#) of your work. You may (1) upload electronic files if the work [meets the requirements](#); otherwise, you must (2) send the work by mail (do not do both).

(1) [Upload your work\(s\)](#): Please perform the following steps for the case(s) in the table below.  
**Step 1:** Click the "Select files to upload" button. Using your computer's browser, select your files for the corresponding work then click the "Start upload" button.  
**Step 2:** After uploading [all files](#) for this work, click the corresponding "[Complete Your Submission](#)" button. Files cannot be uploaded later than 5 days after your first file is received.

**Please note:** Files cannot be returned or deleted once uploaded. To avoid delays and/or a later effective date of registration, please verify the following before uploading a copy of your work(s):

- It is a [category of work](#) that may be uploaded
- It is an [acceptable file type](#)
- It is an [acceptable file size](#)

Upload Your Work(s)

1 - 1 of 1

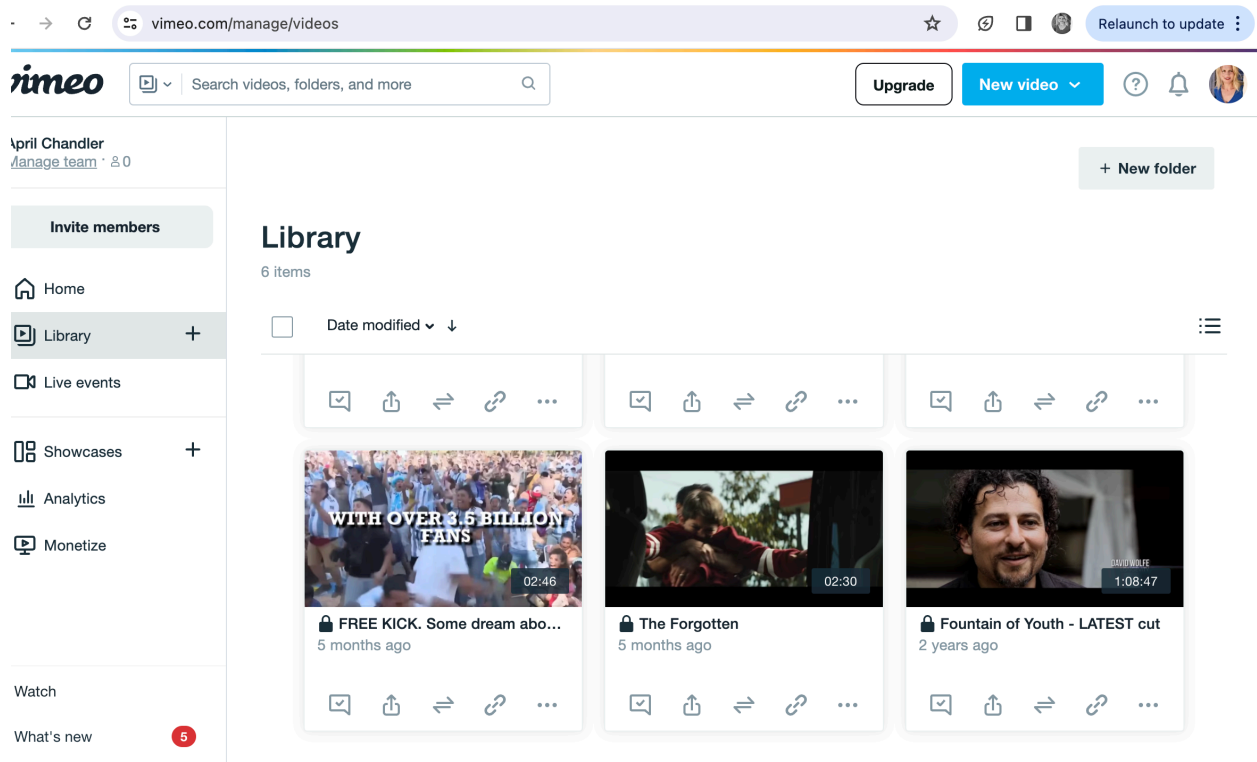
Case Details	Step 1: Select & Upload Files	Step 2: Complete Your Submission
<div>Case #: 1-13494149971 Title: <a href="#">Quest For Youth</a> Volume: Number: Issue Date: Type of Work: Motion Picture/AV Work</div>	<div>Claim submission completed; no further action required</div> <div><a href="#">Click here for more information</a> <a href="#">View Uploaded File Names</a></div>	

⏪ ⏴ ⏵ ⏩

## EXHIBIT 2

FOUNTAIN OF YOUTH – LATEST FILM CUT UPLOADED TO VIMEO 2 YEARS PRIOR TO KNOWING DEFENDANTS MICHAEL MALOY, TOM HARRISON, DAVID GUC.

PRIOR TO PETITIONER AGREEING DISTRIBUTION DEAL WITH BIG MEDIA, PETITIONER CHANGED THE FILM NAME TO QUEST FOR YOUTH FROM FOUNTAIN OF YOUTH. ORIGINAL NAME ETERNAL YOUTH WAS CHANGED TO FOUNTAIN OF YOUTH BY PETITIONER IN 2016.





### EXHIBIT 3

EVIDENCE OF APPLE PAY TO MIKE MALOY DEMONSTRATING HE WAS WORKING FOR PETITIONER ON A “WORK FOR HIRE” BASIS AS EDITOR.

10:35

SOS  

[< Back](#)

# \$2,500.00

To Michael Maloy

2/27/23, 11:40

**Status: Completed**

Sent to Michael Maloy

From Apple Cash	\$139.89
From FRB ATM Visa Debit	\$2,360.11
<b>Sent</b>	<b>\$2,500.00</b>

[Send Again](#)

Transaction ID  
304550b96183

10:35

SOS  

[< Back](#)

# \$2,500.00

To Michael Maloy

9/7/23, 17:49

**Status: Completed**

Sent to Michael Maloy

**Sent**

**\$2,500.00**

[Send Again](#)

Transaction ID

b7fdbef1c604

10:35

SOS  

[< Back](#)

# \$2,500.00

To Michael Maloy

3/15/23, 21:59

**Status: Completed**

Sent to Michael Maloy

**Sent**

**\$2,500.00**

[Send Again](#)

Transaction ID

847f760d5da9

10:35

SOS  

[< Back](#)

# \$2,500.00

To Michael Maloy

3/8/23, 10:03

**Status: Completed**

Sent to Michael Maloy

**Sent**

**\$2,500.00**

[Send Again](#)

Transaction ID

289b1187286e

10:35

SOS  

[< Back](#)

# \$2,500.00

To Michael Maloy

3/6/23, 18:33

**Status: Completed**

Sent to Michael Maloy

**Sent**

**\$2,500.00**

[Send Again](#)

Transaction ID

20b1da389696

10:34

SOS  

[← Back](#)



**Michael Maloy**

Editor

**2/27/23**

Sent

\$2,500.00 >

## History

**9/7/23**

Sent

\$2,500.00 >

**3/15/23**

Sent

\$2,500.00 >

**3/8/23**

Sent

\$2,500.00 >

**3/6/23**

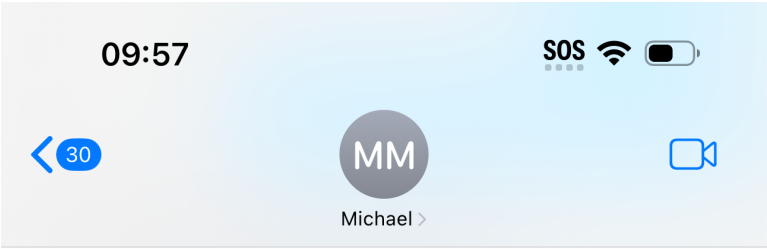
Sent

\$2,500.00 >

#### EXHIBIT 4

EVIDENCE OF TEXT MESSAGES BETWEEN PETITIONER AND MIKE  
MALOY IN 2023 DEMONSTRATING PETITIONER SENT RAW FILM  
FOOTAGE TO DEFENDANT TO EDIT FILM QUEST FOR YOUTH AS A  
“WORK FOR HIRE” EDITOR.





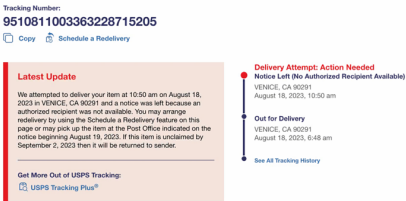
Fri, Aug 18 at 10:54

Good morning Mike. According to tracking, the parcel is out for delivery.

You might actually get it!!! I can't believe it after all the ups and downs in relation to this.

Amazing!

Fri, Aug 18 at 18:13



Hey, just letting you know it's saying they attempted delivery.

I'll go pick it up at the post office.

I just wanted to let you know. 😊

Danke!

I can pick it up first thing tomorrow am and will let you know when it's in my hands.

Great. That will be good to know! 🙏





Sat, Aug 19 at 12:21



Hooray! I'm so glad you have them!! :) I never like sending drives through the mail for obvious reasons, but had no choice as other attempts had failed miserably.



iMessage





09:53

SOS  



Michael >

Sun, Aug 27 at 14:23

Happy weekend indeed April. It's a lovely late August day here at the beach. Before I answer your question about new interviews, let me give you an update.

I've gone through all the material and listened to all the interviews. I'm very happy with all the nuance I've found within them which will allow the film to be very expressive while conveying information.

There are so many great characters and each one has a distinct personality which will be brought out.

The only people I'd leave out are Guy Obelinsky and Brandon Bays. Everyone else is a winner.

Now that I know the material and understand what's available, I can say with confidence that we can come in at a total budget of \$50k.

I anticipate a first cut by the end of




iMessage



## EXHIBIT 5

PRIOR NAME OF DOCUMENTARY FILM FOUNTAIN OF YOUTH LISTED  
ON IMDB IN 2018. UPDATED TO POST PRODUCTION 30TH  
SEPTEMBER 2023.








← → ↻ 🔍 pro.imdb.com/name/nm6457893/credits ☆ ⌂ 🌐



### April Chandler

Director, Producer, Writer [Edit](#) **STARmeter: 182,027** ↑

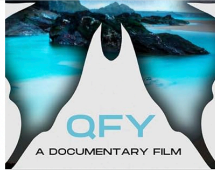
Overview **Credits** About Images Videos Box Office Clients News

	<b>Chevrolet Bolt Electric Vehicle Campaign</b> (2021) (Video) - Drone Operator, Director, Executive Producer		⋮
	<b>Chevrolet Volt Electric Vehicle Campaign</b> (2021) (Video) - Drone Operator, Director, Executive Producer		⋮
	<b>A Day in the Life of a RAM</b> (2020) (Video) - Drone Operator, Director, Executive Producer	CAD 100K	⋮
	<b>Dodge Challenger</b> (2020) (Video) - Drone Operator, Director, Executive Producer	CAD 100K	⋮
	<b>Une année chez les Français</b> (2019) Kohlauer's Mother		⋮
	<b>Fountain of Youth</b> (2018) Producer, Writer		⋮
	<b>The Normans</b> (2016) (Video) - Director, Executive Producer	£100K	⋮



**QFY**  
85 min | Documentary

[Edit page](#) [Add to list](#) [Tracking](#) [⋮](#)



Producer [April Chandler](#)  
Find more **movies** with **Discover Titles**.

📈 580,025

**Status**

Post-Prod  
Updated Sep 30, 2023

[Edit](#) ✎

## Contacts

[+ Add](#)

### Production Company

**Mephobia Media**

[mephobiamedia.com](http://mephobiamedia.com)  
[hello@mephobiamedia.com](mailto:hello@mephobiamedia.com)

📍 1601 N Sepulveda Blvd  
# 533  
Manhattan Beach, CALIFORNIA  
90266  
United States  
[See map](#) (bing.com)

[See all company credits \(1\)](#)

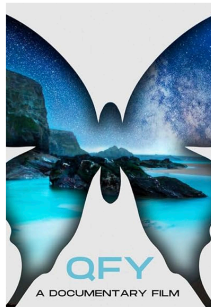
[Cast](#) [Filmmakers](#) [Images](#) [Videos](#) [Details](#) [Box Office](#) [Companies](#) [News](#)

## Filmmakers

[+ Add Filmmakers](#) | [Filter by profession](#) ▾

3 filmmakers

Director (1)	Known for	
<a href="#">April Chandler</a> Director	<a href="#">Forgotten</a>	⋮
Producers (3) ▾	Known for ▾	
<a href="#">David Ball</a> Line Producer	<a href="#">Day of the Dead (1985)</a>	⋮
<a href="#">April Chandler</a> Producer	<a href="#">Forgotten</a>	⋮
<a href="#">Tom Harrison</a> Executive Producer	<a href="#">The Terror of Hallow's Eve (2017)</a>	⋮



## QFY

85 min | [Documentary](#)

[Edit page](#)[Add to list](#)[Tracking](#)

On a quest for youth to uncover the secrets on how to live longer in our lifetime.

Director [April Chandler](#)

Producer [April Chandler](#)

Find more **movies** with [Discover Titles](#).

### Trending

MOVIEmeter

▲ 580,025

### Status

Post-Prod

Updated Sep 30, 2023

[Edit](#) ✎

## Contacts

[+ Add](#)

### Production Company

**Mephobia Media**

[mephobiamedia.com](https://mephobiamedia.com)

[hello@mephobiamedia.com](mailto:hello@mephobiamedia.com)

📍 1601 N Sepulveda Blvd

# 533

Manhattan Beach, CALIFORNIA

90266

United States

[See map](#) (bing.com)

<https://pro.imdb.com/title/tt29352656/cast>



### Cast

[Filmmakers](#)[Images](#)[Videos](#)[Details](#)[Box Office](#)[Companies](#)[News](#)

## Cast

[+ Add Cast](#)

18 cast members

Name ⚙	STARMeter ⚙	Known for ⚙	
 <b>Joseph Dispenza</b> Self	148,770	<a href="#">What the #\$! Do We (K)now!?</a> (2004)	⋮
 <b>April Chandler</b> Narrator	182,027	<a href="#">Forgotten</a>	⋮





## QFY

85 min | Documentary

Edit page

Add to list

Tracking



**Bruce Lipton**  
Self

340,384

Lifestyle Medicine Documentary  
Film (2017)



**John Demartini**  
Self

349,892

The Opus (2008)



**David Wolfe**  
Self

374,327

100 Days in the Raw (2014)



**Burt Goldman**  
Self

1,117,894

Tapping the Source (2010)



**Don Tolman**  
Self

1,448,161

Cancer is Curable NOW (2011)



**Nicholas Perricone**  
Self

1,690,678

Forever Young with Dr. Nicholas  
Perricone (2010)



**Eric Pearl**  
Self

1,906,019

The Portal: Reconnective Healing  
Online Level 1 Course - Course 1  
(2020)



**Bradley Nelson**  
Self

2,192,910

Superpower: Ignite Your Intuitive  
Intelligence (2021)



**Dain Heer**  
Self

2,672,923

QFY 'A Social Experiment'



**Ben Johnson**

3,326,217

QFY



https://pro.imdb.com/title/tt29352656/cast



## QFY

85 min | Documentary

Edit page

Add to list

Tracking



**Thom Knoles**  
Self

3,983,623

Fountain of Youth (2018)



**Frank Kinslow**  
Self

5,871,675

Fountain of Youth (2018)



**Mimi Kirk**  
Self

8,258,776

QFY



**Gabriel Cousens**  
Self

11,559,478

All Jacked Up (2008)



**Gurumukh**  
Self

12,657,070

QFY



**Valerie Hunt**  
Self

12,921,318

QFY



## MOVIEmeter

📈 580,025 📈 Up 294,038 this week





# QFY

85 min | Documentary

Edit page

Add to list

Tracking



https://pro.imdb.com/title/tt29352656/cast

	<b>Bruce Lipton</b> Self	340,384	Lifestyle Medicine Documentary Film (2017)	⋮
	<b>John Demartini</b> Self	349,892	The Opus (2008)	⋮
	<b>David Wolfe</b> Self	374,327	100 Days in the Raw (2014)	⋮
	<b>Burt Goldman</b> Self	1,117,894	Tapping the Source (2010)	⋮
	<b>Don Tolman</b> Self	1,448,161	Cancer is Curable NOW (2011)	⋮
	<b>Nicholas Perricone</b> Self	1,690,678	Forever Young with Dr. Nicholas Perricone (2010)	⋮
	<b>Eric Pearl</b> Self	1,906,019	The Portal: Reconnective Healing Online Level 1 Course - Course 1 (2020)	⋮
	<b>Bradley Nelson</b> Self	2,192,910	Superpower: Ignite Your Intuitive Intelligence (2021)	⋮
	<b>Dain Heer</b> Self	2,672,923	QFY 'A Social Experiment'	⋮
	<b>Ben Johnson</b>	3,326,217	QFY	⋮

## EXHIBIT 6

REDACTED VIDEO RELEASES – FILM CAST DO NOT KNOW DEFENDANTS.  
PETITIONER HAS ALL ORIGINAL RELEASES AND ALL UPDATED RELEASES TO  
SUPPLY DURING DISCOVERY. \*NOTE: UPDATED GIVEN THE TIME LAPSE SINCE  
INTERVIEWS WERE FILMED.

# Mephobia Media

## *“Fountain of Youth”*

I hereby authorize Director & Producer, April Chandler & Mephobia Media Inc. (“Production Company”), and those acting pursuant to its authority a nonexclusive grant to: (a) Record my likeness and voice on video, audio, photographic, digital, electronic, online format or on any and all other media. (b) Use my name in connection with these recordings. (c) Use, reproduce, publish, republish, exhibit, edit, modify, or distribute, in whole or in part, these recordings in all media without compensation for any purpose that the Production Company, and those acting pursuant to its authority, deem appropriate, including promotional or advertising efforts. These recordings may appear in a variety of formats and media now available to the Production Company and may be available in the future (e.g. print publications, video tapes, CD-ROM, Internet, mobile, digital).

I hereby release the Production Company and those acting pursuant to its authority from liability, claims, and demands for any violation of any personal or proprietary right I may have in connection with such use, including any and all claims for libel, defamation, or invasion of privacy. I understand that all such recordings, in whatever medium, shall remain the property of April Chandler & the Production Company. I have read and fully understand the terms of this release.

Name: Dr John Demartini

Address: [REDACTED]

City: [REDACTED]

State: [REDACTED]

Zip Code: [REDACTED]

Phone: [REDACTED]

Email: [REDACTED]

Signature: *Dr John Demartini*

Date: 9 /27 /23



#### PHOTO/VIDEO RELEASE FORM

I hereby authorize Director & Producer, April Chandler & Mephobia Media Inc. ("Production Company"), and those acting pursuant to its authority a nonexclusive grant to:

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Name: Bradley Nelson

Address: [REDACTED]

City: [REDACTED]

State: [REDACTED] Zip Code: [REDACTED]

Phone: [REDACTED] Email: [REDACTED]

Signature: Bradley Nelson Date: Sep 28, 2023

Parent/Guardian Signature (if under 18): \_\_\_\_\_ Date: \_\_\_\_\_





#### PHOTO/VIDEO RELEASE FORM

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Name:

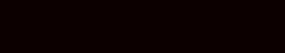


*Business Manager for Mountain of Love Productions, Inc.  
on behalf of Bruce H. Lipson, Ph.D.*

Address:



City:



State:



Zip Code:



Phone:



Email:



Signature:

*[Handwritten signature]*

Date:

*11/1/2023*

Parent/Guardian Signature (if under 18):

Date:



#### PHOTO/VIDEO RELEASE FORM

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I hereby release the Production Company and those acting pursuant to its authority from liability, claims, and demands for any violation of any personal or proprietary right I may have in connection with such use, including any and all claims for libel, defamation, or invasion of privacy. I understand that all such recordings, in whatever medium, shall remain the property of April Chandler & the Production Company. I have read and fully understand the terms of this release.

Name: Dain Heer

Address: [REDACTED]

City: [REDACTED]

State: [REDACTED] Zip Code: [REDACTED]

Phone: [REDACTED] Email: [REDACTED]

Signature:  Date: 10 / 23 / 2023

Parent/Guardian Signature (if under 18): \_\_\_\_\_ Date: \_\_\_\_\_



# MEPHOBIA MEDIA

## PHOTO/VIDEO RELEASE FORM

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(a) Record my likeness and voice on video, audio, photographic, digital, electronic, online format or on any and all other media.

(b) Use my name in connection with these recordings.

(c) Use, reproduce, publish, republish, exhibit, edit, modify, or distribute, in whole or in part, these recordings in all media without compensation for any purpose that the Production Company, and those acting pursuant to its authority, deem appropriate, including promotional or advertising efforts. These recordings may appear in a variety of formats and media now available to the Production Company and may be available in the future (e.g. print publications, video tapes, CD-ROM, Internet, mobile, digital).

d) My name, image, and likeness as well as recordings shall be used in positive, character neutral or uplifting style and edit. David Wolfe's image and likeness and video material shall not be used in a derogatory manner. (DW)

I hereby release the Production Company and those acting pursuant to its authority from liability, claims, and demands for any violation of any personal or proprietary right I may have in connection with such use, including any and all claims for libel, defamation, or invasion of privacy. I understand that all such recordings, in whatever medium, shall remain the property of April Chandler & the Production Company. I have read and fully understand the terms of this release.

Name: David Wolfe

Address: [REDACTED]

City: [REDACTED]

State: [REDACTED] Zip Code: [REDACTED]

Phone: [REDACTED] Email: [REDACTED]

Signature: D. Wolfe Date: October 19, 2023

Parent/Guardian Signature (if under 18): \_\_\_\_\_ Date: \_\_\_\_\_